

Honorable Julius Genachowski, Chairman
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker

Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker,

I am writing to continue to support and strengthen my previous justification that Video Relay Services are a vital link that connects the deaf/hard of hearing community with the hearing community. Without this 24/7 service the ADA law is in violation and human rights are being violated as access would be denied.

As a Human Services professional, Sorenson VRS employee, a nationally certified community Sign Language Interpreter and strong advocate for persons with disabilities, I feel very strongly that Video Relay Services provide deaf and hard of hearing individuals with the access they need to independently navigate through the fast paced communications network as hearing people do. This service is a very positive and vital link that connects deaf people to the hearing community.

I am very passionate about my work and enjoy my career. I truly love my work and I enjoy every minute of it. When people ask me what I do for a career I am proud to say that I work as a Sign Language Interpreter for the top VRS provider that provides excellent service.

Ensuring that deaf individuals have access to VRS and encouraging improvements in VRS should be a high priority for you as Chairman and Commissioners of the Federal Communications Commission (FCC). The Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide “functionally-equivalent” communications.

You will soon determine the future of VRS. When you set the VRS rate, you will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access and inclusion – or force deaf users to revert to TTY communications. And, you will determine whether VRS fulfills its potential to drive broadband adoption by the deaf, even in the face of poverty and isolation.

I was deeply disturbed to see the Commission’s recent Public Notice on VRS rates. These proposals would put an end to VRS as we know it and create a barrier to many people worldwide. This would be disastrous for deaf VRS users, their hearing families, and other providers trying to contact them. My co workers, clients, friends, family, and my work as a nationally certified Sign Language would be greatly impacted by this tragic loss of funding.

The FCC should be increasing the availability and use of VRS, not cutting back. You should adopt a rate that encourages continuing improvements in VRS technology and continues to improve services levels and access for deaf and hard of hearing individuals. Monthly payments for broadband are a big

expense for many deaf people, and instead of trying to cut back on VRS, you should be exploring ways to make VRS over broadband more affordable to deaf individuals. Many of the individuals that I come into contact with cannot use TTY's or other communication devices to communicate due to physical limitations, disabilities, and low language skills. Limiting VRS services and cutting back on funding would be debilitating to these individuals and access that they previously had would be removed.

Progress towards functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available. VRS is a recent and dramatic advancement that benefits those who are deaf, but so much more can be done. It would be tragic if the FCC were to destroy this broadband service that is so vital to the deaf.

Recent reports of fraud in the VRS industry are disturbing to employees who work for a company that has operated within current FCC guidelines and has worked to maintain the integrity of the VRS fund. The FCC must devote more of its time and energy to focusing on the elimination of fraud.

I urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest in improving VRS and reaching more deaf individuals. The law requires it and it is the right thing to do.

The rates for VRS proposed by the Federal Communications Commission (FCC) in its April 30 Public Notice would be a disaster for VRS because –

- The rates are so low that it would be the end of VRS as we know it today. No provider would seek to provide VRS at the low rates proposed by the FCC;
- The FCC proposes a low interim VRS rate. A better option would be a multi-year VRS rate, which would allow VRS providers to continue to invest in their offerings for the deaf.
- VRS and the improvements made to it over the years have moved us closer to the goal of “function equivalence” mandated by the Americans with Disabilities Act. The FCC rate proposal would destroy that progress and move us further from achieving the goals of the ADA.

I truly appreciate and thank you for your time and attention to this matter.

Sincerely,

Andraea Magee